

SEP 13 2018

CLERK, U.S. DISTRICT COURT
By PF Deputy501 WEST 10TH STREET RM 310 - Fort Worth TX
UNITED STATES DISTRICT COURT

for the

NORTHERN District of TEXAS

CIVIL Division

4-18CV-757-A

ZIPONE MAIL TRANSPORTATION CHARTER

MR. JEROME JULIUS BROWN SR, EIN 30-0492915

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

SANTANDER HOLDINGS INC, USA
PRESIDENT CEO, SCOTT POWELL -
CHIEF FINANCIAL OFFICER CARLOS ANTONIO DE SOTO
P.O. BOX 961245 FORT WORTH TX 76161-

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.) INVESTOR RELATIONS @
SANTANDER CONSUMER USA. com

Case No.

18-CV-

(to be filled in by the Clerk's Office)

Jury Trial: (check one) Yes NoUS MARSHALS SERVICES 214-767-0836
US MARSHALS SERVICES 703 837 5500
CIVIL ACTION 1:18-CV-370, WILL CALL
US DISTRICT COURT RICHMOND 804-916-2220
CASE # 3:10-cv-393 USM
CASE # 3:10-cv-394 UNSEVERE
CASE # 02-05-cv-152 CLEAK \$125,000.00
CASE # 02-05-cv-233 JUDGMENT \$100,000.00

COMPLAINT FOR A CIVIL CASE ALLEGING BREACH OF CONTRACT

(28 U.S.C. § 1332; Diversity of Citizenship)

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

U.S. BOUNTY MR. JEROME JULIUS BROWN SR
808 HUNTER FORD DRIVE SUITE (B) #4786
ROCKVILLE - MONTGOMERY
MARYLAND 20849-4786
301-266-5683 - 202-469-9736 - 301-741-3423
JEROMEJULIUSBROWN@GMAIL.COM

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name
 Job or Title (*if known*)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (*if known*)

MARIAM, INC
DARLARS AUTOMOTIVE GROUP: 100425 752
7550 WISCONSIN AVE NW. SUITE 600
BETHESDA - MONTGOMERY
MARYLAND 20814-3559
1800-773-0062

Defendant No. 2

Name
 Job or Title (*if known*)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (*if known*)

EASTERN DIVERS Prop Inc.
DARLARS LINCOLN MERCURY
4700 BULLY BRANCH AVE
TEMPLE HILLS PRINCE GEORGES
MARYLAND 20748-
301-899-1100
S1UCAS@DARLARS.COM

Defendant No. 3

Name
 Job or Title (*if known*)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (*if known*)

MR. JOHN R. DARVISH, PRESIDENT
DARLARS AUTOMOTIVE GROUP: 100425 752
12210 CHERRY HILL ROAD
SILVER SPRINGS - MONTGOMERY
MARYLAND 20904
301-622-0300 FAX 4915
J.DARVISH@DARLARS.COM

Defendant No. 4

Name
 Job or Title (*if known*)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (*if known*)

MR. CHRISTOPHER P. FRIEDMAN
GENERAL COUNSEL, SANFANDER HOLDING USA
P. O. BOX 941
FORT WORTH
TX 76161
1-888-222-4227

II. Basis for Jurisdiction 58-44, civil cover sheet, UNITED STATES GOVERNMENT DEFENDANT.

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

A. The Plaintiff(s)

1. If the plaintiff is an individual

The plaintiff, (name) JEROME JULIUS BROWN, is a citizen of the State of (name) MARYLAND

2. If the plaintiff is a corporation

The plaintiff, (name) N/A, is incorporated under the laws of the State of (name) N/A, and has its principal place of business in the State of (name) N/A

N/A

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) PRESIDENT CEO, SCOTT POWELL, is a citizen of the State of (name) TEXAS. Or is a citizen of (foreign nation) N/A

2. If the defendant is a corporation

The defendant, (name) SCOTT POWELL, PRESIDENT CEO, is incorporated under the laws of the State of (name) TEXAS, and has its principal place of business in the State of (name) TEXAS. Or is incorporated under the laws of (foreign nation) TEXAS, and has its principal place of business in (name) TEXAS

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The plaintiff, (name) TEROME JEROME BROWN SR, and the defendant, (name) SANTANDER HOLDING INC - CHIEF FINANCIAL, DE SOTO, made an agreement or contract on (date) 10-14-2014. The agreement or contract was (oral or written) WRITTEN. Under that agreement or contract, the parties were required to (specify what the agreement or contract required each party to do) CONTRACT NOT BOX CHECK ASSIGNED WITH RE COURSE. CONTRACT BREACH CREDITOR - SELLER NO MARYLAND BUSINESS EXPRESS BUSINESS ENTITY OR DEPARTMENT ID NO. UNDER DARCAS OF BRANCH AVE INC.

The defendant failed to comply because (specify what the defendant did or failed to do that failed to comply with what the agreement or contract required)

TERMS OF THE CONTRACT, NO OTHER OWNER IS A PERSON WHOSE NAME IS ON THE TITLE TO THE VEHICLE but, NO SIGNATURE OR ADDRESS - BREACH THE OTHER OWNER AGREES TO THE SECURITY INTEREST IN THE VEHICLE GIVEN TO US IN THIS CONTRACT, NO SIGNATURE OTHER OWNER BREACH OR CONTRACT,

The plaintiff has complied with the plaintiff's obligations under the contract.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 06 29 2018

Signature of Plaintiff

UNITED STATES LLP, Jerome Julius Brown Jr

Printed Name of Plaintiff

UNITED STATES LLP, Jerome Julius Brown Jr

B. For Attorneys

Date of signing: _____

Signature of Attorney

JANICE L. COLE Chief Council

Printed Name of Attorney

Bar Number

Name of Law Firm

WMATA, Metro transit Police Recusal order -

Street Address

600 FIFTH STREET N.W

_____ and Zip Code

DISTRICT OF COLUMBIA 20001

Telephone Number

202 962 2550 - 1013

E-mail Address

JL COLE@WMATA.COM

CAPITAL DISTRICT 203

10 SEP 2018 PM 2 1

From: United States LLP
Terence Julius Brown
580 North Washington Street # 4706
Rockville MD 20849 -4706



To: United States District Court
Clerk Office Room 310
501 West 10th Street
Fort Worth TX 76102

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